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14 Attorneys for Plaintiff
15 VERIGY US, INC.

16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA
18 SAN JOSE DIVISION

19 VERIGY US, INC, a Delaware Corporation

20 Plaintiff,

21 vs.

22 ROMI OMAR MAYDER, an individual;
23 WESLEY MAYDER, an individual; SILICON
24 TEST SYSTEMS, INC., a California Corporation;
25 and SILICON TEST SOLUTIONS, LLC, a
26 California Limited Liability Corporation,
27 inclusive,

28 Defendants.

Case No. C07 04330 RMW (HRL)

**PLAINTIFF'S ADMINISTRATIVE
MOTION FOR LEAVE TO FILE
DOCUMENTS UNDER SEAL**

Judge: Honorable Ronald M. Whyte
Ctrm: 6

1 Pursuant to Civil Local Rules 7-11(a) and 79-5(b), Plaintiff Verigy U.S., Inc. ("Plaintiff"
2 or "Verigy") requests that the following materials be filed under seal, as they contain confidential
3 information that is protected by the Stipulated Protective Order entered by the Court on August
4 29, 2007. The documents submitted under seal include:

- 5 1. Portions of the Objections to Defendants' Evidence in Support of Sur-Reply to
6 Order to Show Cause Re: Preliminary Injunction, dated December 13, 2007.
- 7 2. Portions of the Declaration of Michael W. Stebbins in Support of Plaintiff's
8 Objections to Defendants' Evidence in Support of Sur-Reply to Order to Show
9 Cause Re: Preliminary Injunction, dated December 13, 2007.

10 These materials (hereafter "the Materials") each disclose information that has been
11 designated as "Highly Confidential—Attorneys' Eyes Only" or "Confidential" by the parties
12 under the protective order, without objection to those designations (although Verigy reserves its
13 rights to challenge such designations pursuant to the Stipulated Protective Order). Although the
14 information in the Materials has been designated as protected from disclosure under the Protective
15 Order, Verigy relies on this information in support of its motion for preliminary injunction. The
16 parties' confidentiality interest therefore overcomes the right of public access to the record, as a
17 substantial probability exists that the parties' overriding confidentiality interest will be prejudiced
18 if the record is not sealed. Further, the proposed sealing is narrowly tailored and no less restrictive
19 means exist to achieve this overriding interest

20 Pursuant to Local Civil Rule 79-5(b)-(c), Verigy therefore lodges the Materials with this
21 Court, and respectfully requests leave to file the aforementioned documents under seal.

22 Respectfully submitted.

23 Dated: December 13, 2007

BERGESON, LLP

24 By: /s/
25 Michael W. Stebbins
26 Attorneys for Plaintiff
27 VERIGY US, INC.
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